

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**UNOPPOSED MOTION FOR LEAVE TO PROCEED  
WITHOUT LOCAL COUNSEL**

Pursuant to Local Civil Rule 83.10(a) of the United States District Court for the Northern District of Texas, Defendants Valerie Coleman, Caitlin V. Cooke, Eduardo Creque, Jessica M. Furr (Keen), Kathy Keller, Fouad Naghmi, Tammy Neal, Charles F. Peer, Michaelene Whyte, and Melissa Willoby (“Individual Defendants”) move to proceed in the above-captioned case without local counsel, and in support thereof, state as follows:

Undersigned counsel, Tyree P. Jones, Jr., Manasi Venkatesh, and Stephan Selinidis of the firm Reed Smith LLP, have familiarity with this matter, as well as with the applicable substantive and procedural rules of this Court. Mr. Jones and Ms. Venkatesh have been admitted to this Court *pro hac vice*, and Mr. Selinidis is a member of the bar of this Court.

Mr. Jones, who has served as lead counsel in this matter since the time that the Individual Defendants were named herein, has been a practicing attorney for over 30 years, has practiced in federal courts throughout the country, has regularly litigated similar claims to those being

asserted against Individual Defendants, has developed familiarity with this Court's rules, and is fully prepared to proceed in this Court for this case. Ms. Venkatesh has also been assisting in this matter since the time that the Individual Defendants were named herein, has experience practicing in federal courts, and has developed familiarity with this Court's rules. Furthermore, Mr. Selinidis, whose principal office is located in Houston, Texas, has been a practicing attorney in Texas since 2006, has practiced in federal courts throughout this State, and is fully prepared to assist in this matter. Lastly, undersigned counsel does not anticipate any issues with respect to the geographical distance between counsel's office and the Northern District, and like lead counsel for Plaintiff, who has been granted permission to proceed without local counsel, counsel's principal office is located in Washington, DC.

WHEREFORE, for the above stated reasons, Individual Defendants pray that the Court grant its request to proceed in the above-captioned case without local counsel. If such request is granted, local counsel of record will request withdrawal from this matter.

Dated: May 7, 2018

Respectfully submitted,

**REED SMITH LLP**

By: /s/ Tyree P. Jones Jr.  
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/s/ Stephan D. Selinidis

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Willoby*

**CERTIFICATE OF CONFERENCE**

This is to certify that on May 3rd, 2018, counsel conferred with William B. Mateja and David Rockwell Bower (local counsel), Jason McElroy (counsel for Plaintiff), Jason Elliot (counsel for Defendant Pacific Union Financial LLC), and Braden Wayne (counsel for Defendant John Perry), and all stated they are UNOPPOSED to the relief sought in this Motion.

By: /s/ Tyree P. Jones Jr.  
Tyree P. Jones, Jr.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7th day of May 2018, a true and correct copy of the foregoing Unopposed Motion for Leave to Proceed Without Local Counsel was submitted with the clerk of the court and served upon all counsel of record using the CM/ECF system of this court.

By: /s/ Tyree P. Jones Jr.  
Tyree P. Jones, Jr.